IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ROCIO MARTINEZ, MARGARITA	
VILLALOBOS, ALEJANDRO	
RAMIREZ, and CHRISTIAN TAPIA,	CASE NO. 13-cv-7183
individually and on behalf of others	
similarly situated,	Judge Virginia Kendall
Plaintiffs,	Magistrate Judge Michael Mason
v.	
VALID USA, INC., DAN KHOURI,	
PARAMESWARI VELUCHAMY,	
PETHINAIDU VELUCHAMY,	
and TIMOTHY HOOKS,	
)	
Defendants.	

PLAINTIFFS' UNCONTESTED MOTION FOR PRELIMINARY APPROVAL OF A CLASS AND COLLECTIVE ACTION SETTLEMENT; CONDITIONAL CERTIFICATION OF SETTLEMENT CLASSES; DESIGNATION OF CLASS REPRESENTATIVES AND APPOINTMENT OF PLAINTIFFS' COUNSEL; AND APPROVAL OF THE FORM AND MANNER OF CLASS SETTLEMENT NOTICE

Pursuant to Federal Rule of Civil Procedure 23, Plaintiffs ask the Court to enter an order:

- Preliminarily approving the class-wide Settlement Agreement negotiated by
 Plaintiffs and Defendants Dan Khouri, Parameswari Veluchamy, Pethinaidu Veluchamy, and
 Timothy Hooks;
 - 2. Conditionally certifying the proposed class for settlement purposes only;
- 3. Designating Rocio Martinez, Margarita Villalobos, Alejandro Ramirez, and Christian Tapia as Class Representatives and their attorneys as Class Counsel;
 - 4. Approving the form and manner of class notice; and
 - 5. Setting a date for a final fairness hearing.

6. A draft order is attached to the memorandum of law filed in support of this motion.

WHEREFORE, Plaintiffs request entry of the attached draft order or a similar order.

Respectfully submitted,

/s/ Christopher J. Wilmes

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